

UNITED STATES DISTRICT COURT

for the

NORTHERN District of CALIFORNIASAN JOSE DivisionVINTON FROST

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

ROBIN VASAN, GARY PINKUS,
STANFORD UNIVERSITY, PALO ALTO
POLICE DEPARTMENT, CITY OF PALO ALTO

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

16-cv-05883 NC
(to be filled in by the Clerk's Office)Jury Trial: (check one) ☒ Yes ☐ No

FILED

APR - 3 2017

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FIRST AMENDED
COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

VINTON FROST

Street Address

516 O'FARRELL ST. #611

City and County

SAN FRANCISCO, SAN FRANCISCO

State and Zip Code

CALIFORNIA 94102

Telephone Number

(415) 608-1029

E-mail Address

plv@hsfunders@icloud.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

ROBIN VASAN
PARTNER, MAYFIELD FUND
13300 BURKE ROAD
LOS ALTOS HILLS, SANTA CLARA
CALIFORNIA 94022
work 650-854-5560
unknown

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

GARY S. PINKUS
SENIOR MANAGING PARTNER, MCKINSEY & CO.
210 JOSSELYN LANE
WOODSIDE, SAN MATEO
CALIFORNIA 94062
(work) 415-318-5227 (mob) 415 827-5227
gary - pinkus@mckinsey.com

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

LELAND STANFORD JUNIOR UNIVERSITY
C/O DEBRA ZUMWALT, OFFICE OF PRESIDENT, ~~STANFORD~~
BUILDING 10
STANFORD, SAN MATEO
CALIFORNIA 94305
(650) 723-2481
unknown

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

~~DEFENDANT~~
~~NAME~~ VIK
PALO ALTO POLICE DEPARTMENT,
~~AND CHIEF OF POLICE~~
275 FOREST AVENUE, ~~250 HAMILTON AVE.~~
PALO ALTO, SANTA CLARA
CALIFORNIA
(650) ~~329-2413~~ 329-2413
unknown

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 5

Name

CITY OF PALO ALTO

Job or Title *(if known)*

CITY CLERK

Street Address

250 HAMILTON AVE.

City and County

PALO ALTO, SANTA CLARA

State and Zip Code

CALIFORNIA

Telephone Number

(650) 329-2571

E-mail Address *(if known)*

Unknown

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

18 U.S.C. SECTION 371, CONSPIRACY TO OFFEND

B. ~~If the Basis for Jurisdiction Is Diversity of Citizenship~~

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

ROBIN VASAN WAS THE LEAD ORGANIZER WITH GARY PINKUS OF A CONSPIRACY TO DRUG ME AND STEAL MY MEDICAL FILES. AIDING AND ABETTING THE CONSPIRACY, ROB CHANDRA AND AN UNNAMED ASSOCIATE FROM HARVARD BUSINESS SCHOOL ENDED ME IN CONVERSATION, DRUGGED ME WITH A BEER FROM AN OFFICIAL TAILGATER, INVITED ME TO THE WESTIN LOBBY BAR FOR A LAST DRINK, WHERE MY RECORDS WERE STOLEN, AND HAVING TAKEN PHOTOGRAPHS OF CHANDRA AND THE UNNAMED, THEN SUFFERED BATTERY AND THEFT BY THE UNNAMED, AND THEN SUFFERED FALSE ARREST, FALSE IMPRISONMENT AND ENDANGERMENT ^{AND LACK OF ACTION} THROUGH THE WILLFUL NEGLIGENCE OF ALTO ALTO POLICE, WITH ANCILLARY SURVEILLANCE PROVIDED BY A STANFORD EMPLOYEE.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

THROUGH JUDICIAL PROCESS, PLAINTIFF WILL PROVE A PATTERN OF BEHAVIOR BY THE CONSPIRACY TO ABUSE ME OF MY LIBERTIES AND THEREAFTER TO OBSTACLE JUSTICE [SEE PENDING FIRST AMENDED COMPLAINT, 17-CV-01308-LB, UNDER 18 SECTION 371, CONSPIRACY TO DEFRAUD THE UNITED STATES]. PLAINTIFF DEMANDS THE CONSPIRACY PAY HIM \$200 MILLION IN COMPENSATORY, OPPORTUNITY COST, PAIN & SUFFERING, AND EXEMPLARY AND PUNITIVE DAMAGES.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

4/3/17

Signature of Plaintiff _____



Printed Name of Plaintiff _____

VINTON FROST.

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____